



Lawrence S. Lustberg
Director

Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
Direct: 973-596-4731 Fax: 973-639-6285
llustberg@gibbonslaw.com

April 5, 2024

VIA ECF

Honorable Pamela K. Chen, United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. McMahon, et al.
Docket No. 21-cr-265

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-referenced matter. I write to respectfully request that the Court enter the attached Proposed Consent Order, which will allow Mr. McMahon to travel to Florida from Thursday, April 25, 2024 to Monday, April 29, 2024, so that he may visit his 80-year old uncle, who is very ill due to pneumonia and currently hospitalized in Bonita Springs, Florida, as well as to attend a prayer meeting at the Ave Maria Catholic Church in Ave Maria, Florida over that weekend.

We have been in contact with Rhonda LeGrand of the United States Office of Pretrial Services, who has advised that her Office has no objection to Mr. McMahon's proposed travel, given that Mr. McMahon has, throughout the long pendency of this matter, always been in full compliance with the terms of his pretrial release; Pretrial Services requests only that it be provided with a travel itinerary, which we will certainly do – that requirement is reflected in the Proposed Order attached hereto. Additionally, the Government, through Assistant U.S. Attorney Craig Heeren, has very graciously advised that it also has no objection to Mr. McMahon's brief proposed travel.

If the enclosed Order is satisfactory to Your Honor, we would be most grateful if the Court would execute and file it at Your Honor's earliest convenience. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. Thank you for your kind consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)

GIBBONS P.C.

Hon. Pamela K. Chen, U.S.D.J.
April 5, 2024
Page 2